

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Jeffrey E. Martin
Debtor 1

Jeffrey E. Martin

Movant(s)
v.

PNC Bank, NA

Respondent(s)

Jack N. Zaharopoulos, Esquire

Standing Chapter 13 Trustee

Additional Respondent

Chapter 13

Case No. 1:20-BK-01043-HWV

Matter: Motion to Reimpose Automatic Stay

DEBTOR(S)' MOTION TO REIMPOSE AUTOMATIC STAY

AND NOW, come the Debtor(s), Jeffrey E. Martin, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Motion to Reimpose Automatic Stay and aver as follows:

1. Debtor(s) filed a voluntary Chapter 13 Petition and Plan on or about March 17, 2020. Debtor(s)' Chapter 13 Plan was confirmed by Order of Court dated October 26, 2021.
2. At the time of filing, Debtor(s) were indebted on a mortgage to PNC Bank, NA ("Movant") for Debtor(s)' personal residence at 611 Prospect Avenue, Shippensburg, Franklin County, Pennsylvania.
3. On or about September 27, 2022, Movant(s) filed a Motion for Relief from the Automatic Stay (the "Motion"), alleging that Debtor(s) had not made four post-petition mortgage payments.
4. No response was received from Debtor(s) by the hearing date and the Court entered an Order on October 13, 2022.
5. Since the entry of the Order, counsel has received information from Debtor(s) indicating that they cured the post-petition arrears stated in the Motion.
6. On or about October 4, 2022, and October 18, 2022, Debtor(s) made two electronic payments to PNC Bank in the amounts of \$2,655.00 and \$664.00. Attached marked as Exhibit "A" are true and correct copies of the receipts for those payments received by the Debtor.
7. Debtor(s) now requests that this Court reinstate the automatic stay and set a new hearing date for the Motion, if necessary.

WHEREFORE, Debtor(s) respectfully requests that the Court enter an Order in the form of the attached proposed Order, reinstating the automatic stay with respect to Debtor(s)' personal residence.

Respectfully submitted,
DETHLEFS PYKOSH & MURPHY

Date: November 4, 2022

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire
PA ID No. 201207
2132 Market Street
Camp Hill, PA 17011
(717) 975-9446
pmurphy@dplglaw.com
Attorney for Debtor(s)

Here's what happened: You authorized PNC Bank to debit your checking or savings account on Oct 04 2022 to make a payment to the PNC account ending in

Here are the details of your payment:

Payment Amount: \$2,655.00
Payment Date: October 04, 2022
Checking or Savings Account Number:
Bank Routing Number:
PNC Confirmation Number: 1317248248

Here's what you can expect:

The electronic debit to your checking or savings account will occur on or after the Payment Date. Your one-time payment will be effective on the Payment Date. Payments made after 08:00 PM ET will be applied as of the next business day. Please keep this notice with your records as documentation of this payment.

If you have questions about your payment or if you want to submit a request to cancel your payment, you may call us at 800-822-5626. Your request to cancel a payment must be received by 08:00 PM ET on the Payment Date.

If your financial institution is unable to process the electronic debit (or if PNC Bank did not electronically debit your account), you have authorized PNC Bank to obtain payment with a check payable to PNC Bank that is drawn on your bank account, unless prohibited by law.

If your payment is returned, you may be charged a fee(s). For information on fees and how they will be assessed, please refer to your account agreement, loan documents, and/or rate and fee schedule.

Here's how you can reach us if you have questions or need assistance:

We're here to help. If you have questions or need assistance, please call us at 800-822-5626.

Here's what happened: You authorized PNC Bank to debit your checking or savings account on Oct 18 2022 to make a payment to the PNC account ending in

Here are the details of your payment:

Payment Amount: \$664.00
Payment Date: October 18, 2022
Checking or Savings Account Number:
Bank Routing Number:
PNC Confirmation Number: 1415512672

Here's what you can expect:

The electronic debit to your checking or savings account will occur on or after the Payment Date. Your one-time payment will be effective on the Payment Date. Payments made after 08:00 PM ET will be applied as of the next business day. Please keep this notice with your records as documentation of this payment.

If you have questions about your payment or if you want to submit a request to cancel your payment, you may call us at 800-822-5626. Your request to cancel a payment must be received by 08:00 PM ET on the Payment Date.

If your financial institution is unable to process the electronic debit (or if PNC Bank did not electronically debit your account), you have authorized PNC Bank to obtain payment with a check payable to PNC Bank that is drawn on your bank account, unless prohibited by law.

If your payment is returned, you may be charged a fee(s). For information on fees and how they will be assessed, please refer to your account agreement, loan documents, and/or rate and fee schedule.

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ORDER OF COURT

UPON CONSIDERATION of the Debtor(s)' Motion to Reimpose Automatic Stay, and good cause having been shown, IT
IS ORDERED that the automatic stay with respect to Debtor(s)' personal residence is hereby reimposed.

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

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Matter: Motion to Reimpose Automatic Stay

CERTIFICATE OF SERVICE

I hereby certify that on Friday, November 4, 2022, I served a true and correct copy of the **Debtor(s)' Motion to Reimpose Automatic Stay and proposed Order** in this proceeding via electronic means or USPS First Class Mail upon the recipients as listed in the Mailing Matrix.

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P.
Paralegal for Paul D. Murphy-Ahles, Esquire

Label Matrix for local noticing
0314-1
Case 1:20-bk-01043-HWV
Middle District of Pennsylvania
Harrisburg
Fri Nov 4 11:39:00 EDT 2022

Action Financial Services, LLC
PO Box 3250
Central Point, OR 97502-0009

Capital One Bank USA, NA
PO Box 30285
Salt Lake City, UT 84130-0285

Comenity Bank / Ulta
Attn: Bankruptcy Department
PO Box 183003
Columbus, OH 43218-3003

Discover Financial Services, LLC
PO Box 3035
New Albany, OH 43054-3025

Franklin County Tax Claim Bureau
Old Courthouse, 1st Floor
Chambersburg, PA 17201

(p)MANLEY DEAS KOCHALSKI LLC
ATTN BANKRUPTCY DEPT
1555 LAKE SHORE DRIVE
COLUMBUS OH 43204-3825

NPRT0 North-East, LLC
256 West Data Drive
Draper, UT 84020-2315

Patriot Federal Credit Union
800 Wayne Avenue
PO Box 778
Chambersburg, PA 17201-0778

Quantum3 Group LLC as agent for
Comenity Capital Bank
PO Box 788
Kirkland, WA 98083-0788

PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541-1021

Capital One Bank (USA), N.A.
by American InfoSource as agent
PO Box 71083
Charlotte, NC 28272-1083

Capital One, N.A.
c/o Becket and Lee LLP
PO Box 3001
Malvern PA 19355-0701

Comenity Bank / Victoria's Secret
Attn: Bankruptcy Department
PO Box 182125
Columbus, OH 43218-2125

Discover Personal Loans
PO Box 30954
Salt Lake City, UT 84130-0954

JPMorgan Chase Bank, N.A.
s/b/m/t Chase Bank USA, N.A.
c/o Robertson, Anschutz & Schneid, P.L.
6409 Congress Avenue, Suite 100
Boca Raton, FL 33487-2853

McCarthy, Burgess & Wolff
26000 Cannon Road
Bedford, OH 44146-1807

(p)PNC BANK RETAIL LENDING
P O BOX 94982
CLEVELAND OH 44101-4982

Progressive Leasing
256 Data Drive
Draper, UT 84020-2315

Richard A. Savrann, Esquire
2500 Quantum Lakes Drive #201B
Boynton Beach, FL 33426-8324

U.S. Bankruptcy Court
Ronald Reagan Federal Building
228 Walnut St, Rm 328
Harrisburg, PA 17101-1737

Capital One Bank / Kohl's
N56 West 17000 Ridgewood Drive
Menomonee Falls, WI 53051

(p)JPMORGAN CHASE BANK N A
BANKRUPTCY MAIL INTAKE TEAM
700 KANSAS LANE FLOOR 01
MONROE LA 71203-4774

Convergent Outsourcing, Inc.
800 SW 39th Street
PO Box 9004
Renton, WA 98057-9004

Franklin County Tax Claim Bureau
2 North Main Street
Chambersburg PA 17201

LVNV Funding, LLC
Resurgent Capital Services
PO Box 10587
Greenville, SC 29603-0587

Merchants & Medical
Credit Corporation, Inc.
6324 Taylor Drive
Flint, MI 48507-4685

Patenaude & Felix, APC
Southpointe Center
501 Corporate Drive #205
Canonsburg, PA 15317-8584

Quantum3 Group LLC as agent for
Comenity Bank
PO Box 788
Kirkland, WA 98083-0788

Santander Bank, NA
601 Penn Street
10-6438-FB7
Reading, PA 19601-3563

Santander Consumer USA Inc.
PO Box 560284
Dallas, TX 75356-0284

SunTrust Bank now Truist Bank
ATTN: Support Services
Bankruptcy Department, P.O. Box 85092
Richmond, VA 23286-0001

Suntrust Bank
PO Box 85052
Richmond, VA 23285-5052

Synchrony Bank
c/o PRA Receivables Management, LLC
PO Box 41021
Norfolk VA 23541-1021

Synchrony Bank / Lowe's
Attn: Bankruptcy Department
PO Box 965061
Orlando, FL 32896-5061

US Department of Education
Attn: Claims Filing Unit
PO Box 8973
Madison, WI 53708-8973

United States Trustee
228 Walnut Street, Suite 1190
Harrisburg, PA 17101-1722

Verizon
by American InfoSource as agent
PO Box 4457
Houston, TX 77210-4457

Verizon Wireless
PO Box 25505
Lenigh Valley, PA 18002-5505

Zwicker & Associates, PC
3220 Tillman Drive, Suite 215
Bensalem, PA 19020-2028

(p)JACK N ZAHAROPOULOS
ATTN: CHAPTER 13 TRUSTEE
8125 ADAMS DRIVE SUITE A
HUMMELSTOWN PA 17036-8625

Jeffrey E. Martin
611 Prospect Avenue
Shippensburg, PA 17257-8988

Paul Donald Murphy-Ahles
Dethlefs Pykosh & Murphy
2132 Market Street
Camp Hill, PA 17011-4706

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Chase Card
PO Box 15298
Wilmington, DE 19850

Manley Deas Kochalski, LLC
1555 Lake Shore Drive
PO Box 165028
Columbus, OH 43216-5028

PNC Bank, N.A.
3232 Newmark Drive
Miamisburg, OH 45342

(d)PNC Bank, NA
2730 Liberty Avenue
Pittsburgh, PA 15222

(d)PNC Bank, National Association
Attn: Bankruptcy Dept.
3232 Newmark Drive
Miamisburg, OH 45342

Jack N Zaharopoulos (Trustee)
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)PNC BANK, NATIONAL ASSOCIATION

(u)PNC Mortgage, a division of PNC Bank, Nati

(d)Synchrony Bank
c/o PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541-1021

End of Label Matrix	
Mailable recipients	42
Bypassed recipients	3
Total	45

